

David A. Senter, Jr.

From: Michael S. Rainey <michael.rainey@youngmoorelaw.com>
Sent: Monday, July 23, 2018 4:11 PM
To: 'Randles, Theodore B.'; 'Justin B. Hunter'; Camilla DeBoard;
'dhorton@hedrickgardner.com'
Cc: Baldrige, J. Douglas; Tony Hartsoe (thartsoe@hartsoelaw.com); Katie Hinds
(khinds@hartsoelaw.com); Zack Carico
Subject: RE: Futreal v. Ringle

Theodore,

Per our meet and confer and telephone conference with Judge Flanagan, we believe that a number of items are missing from the Enterprise Defendants' production. Based on the current written responses and document production, we are unable to determine whether additional documents simply do not exist or whether documents are being withheld pursuant to an objection. Categories of documents for which no or insufficient responses have been received include the following:

- Statements regarding the subject incident (RPD 1);
- Documents related to the Enterprise Defendants' investigation of the incident (3, 46, 47) – an "investigative file" was identified in your initial disclosures, but does not appear to have been produced;
- Documents sent to any insurance company or internal insurance/claims department regarding Defendant, the incident, or alleged injuries (9, 30);
- Documents regarding violations of industry standards (13);
- Accident related data (19, 48);
- Copies of policies, procedures, training materials (36-38, 40, 41, 43, 52, 59) – Other than the underwriting guidelines for NC, I do not believe we have seen any responsive materials that govern rental of a vehicle, the process to be followed in evaluating a rental applicant, etc.;
- Rental file for the subject vehicle (42);
- Documents regarding decision to list Ringle as authorized driver (45, 49);
- Disciplinary records regarding employee involved in rental to Ringle (50);
- Copy of Ringle's driver's license (51);
- Copies of filings with secretary of state identifying officers and directors (54) – We understood Judge Flanagan to agree that our request was reasonable with the limitation that we are only seeking documents that show the officers and directors on a year-by-year basis;
- Studies or evaluations regarding rental to individuals with ignition interlock restriction (55, 65, 66);
- Copies of similar lawsuits (56, 57);
- Profit/loss statements, tax returns (61, 62); and
- List of fleet vehicles equipped with ignition interlock device (64).

With respect to the requests for policies, procedures, and training materials, we agreed to limit our requests to production of those documents applicable to the Enterprise facilities in North Carolina.

In addition, to date, privilege has not been specifically asserted in response to any request and no privilege log has been produced. Therefore, as previously discussed, we believe that Enterprise Defendants have waived any objection as to privilege.

If Enterprise does not remedy the above-described deficiencies in its discovery responses by close of business on August 1st, we will proceed with filing a Motion to Compel.

EXHIBIT G

Thanks,



Michael S. Rainey | Partner

Young Moore and Henderson, P.A.

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✓ ANOTHER PROBLEM SOLVED



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From: Randles, Theodore B. <TBRandles@Venable.com>

Sent: Friday, July 20, 2018 2:22 PM

To: Michael S. Rainey <michael.rainey@youngmoorelaw.com>; 'Justin B. Hunter' <jbh@hunterandprice.com>; Camilla DeBoard <cfid@trslaw.com>; 'dhorton@hedrickgardner.com' <dhorton@hedrickgardner.com>

Cc: Baldridge, J. Douglas <JBaldridge@Venable.com>; Tony Hartsoe (<thartsoe@hartsoelaw.com>
<thartsoe@hartsoelaw.com>; Katie Hinds (<khinds@hartsoelaw.com>
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Subject: RE: Futreal v. Ringle

Michael, yes, Enterprise has produced documents per its responses and objections and as discussed at our meet and confer. If you feel something is missing, please feel free to reach out. Thanks.

From: Michael S. Rainey [<mailto:michael.rainey@youngmoorelaw.com>]

Sent: Thursday, July 19, 2018 1:43 PM

To: Randles, Theodore B. <TBRandles@Venable.com>; 'Justin B. Hunter' <jbh@hunterandprice.com>; Camilla DeBoard <cfid@trslaw.com>; 'dhorton@hedrickgardner.com' <dhorton@hedrickgardner.com>

Cc: Baldridge, J. Douglas <JBaldridge@Venable.com>; Tony Hartsoe (<thartsoe@hartsoelaw.com>
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Theodore,

Is this everything that Enterprise intends to produce?

Thanks,



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From: Randles, Theodore B. <TBRandles@Venable.com>

Sent: Friday, July 6, 2018 12:25 PM

To: Michael S. Rainey <michael.rainey@youngmoorelaw.com>; 'Justin B. Hunter' <jbh@hunterandprice.com>; Camilla DeBoard <cfd@trslaw.com>; 'dhorton@hedrickgardner.com' <dhorton@hedrickgardner.com>

Cc: Baldridge, J. Douglas <JBaldridge@Venable.com>; Tony Hartsoe <thartsoe@hartsoelaw.com> <thartsoe@hartsoelaw.com>; Katie Hinds <khinds@hartsoelaw.com> <khinds@hartsoelaw.com>; Zack Carico <zcarico@hartsoelaw.com>

Subject: Futreal v. Ringle

Counsel:

Please see attached correspondence. The materials are being mailed to Plaintiffs' counsel today and can be downloaded at the following link: <https://venable.sharefile.com/d-s715332a767b4a7f8>.

Sincerely,

Theodore B. Randles, Esq. | Venable LLP

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